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Attorney(s) for Rothschild Patent Imaging, LLC

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

**ROTHSCHILD PATENT
IMAGING LLC,**

Plaintiff,

vs.

IQ LOGIC, INC. d/b/a SLICKPIC

Defendant.

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Case No. 3:22-cv-01937

PATENT CASE

COMPLAINT

Plaintiff Rothschild Patent Imaging LLC (“Plaintiff” or “RPI”) files this original Complaint against IQ Logic, Inc. d/b/a SlickPic (“Defendant” or “SlickPic”) for infringement of United States Patent No. 8,437,797 (“the ‘797 Patent”).

PARTIES AND JURISDICTION

1. This is an action for patent infringement under Title 35 of the United States Code. Plaintiff is seeking injunctive relief as well as damages.

2. Jurisdiction is proper in this Court pursuant to 28 U.S.C. §§ 1331 (Federal Question) and 1338(a) (Patents) because this is a civil action for patent infringement arising under the United States patent statutes.

3. Plaintiff is a Texas limited liability company having an address at 1 East Broward Boulevard, Suite 700, Ft. Lauderdale, FL 33301.

7 5. On information and belief, this Court has personal jurisdiction over
8 Defendant because Defendant has committed, and continues to commit, acts of
9 infringement in this District, has conducted business in this District, and/or has
10 engaged in continuous and systematic activities in this District.

VENUE

COUNT I

21 || 8. Paragraphs 1-7 are incorporated herein.

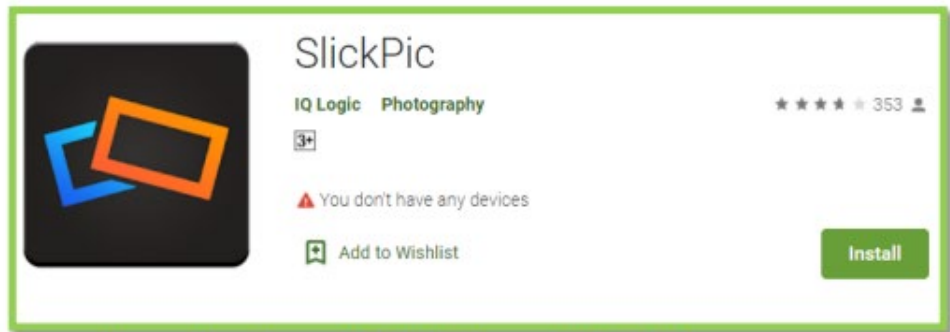
24 10. Plaintiff is the owner by assignment of the '797 Patent with sole rights to
25 enforce the '797 patent and sue infringers.

1 12. The ‘797 Patent is valid, enforceable, and was duly issued in full
2 compliance with Title 35 of the United States Code.

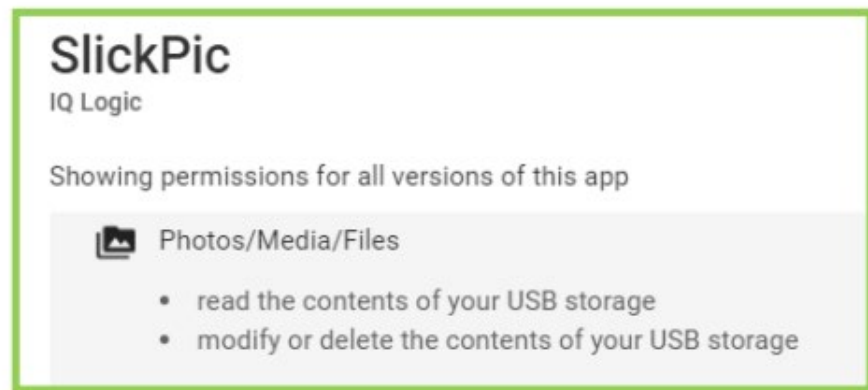
3 13. On information and belief, Defendant has infringed and continues to
4 infringe one or more claims (at least by having its employees, or someone under
5 Defendant's control, test the accused product), including at least Claim 16 of the ‘797
6 Patent by making, using, importing, selling, and/or offering for sale network storage
7 systems including hardware, software and firmware, covered by at least Claim 16 of
8 the ‘797 Patent.

9 14. On information and belief, Defendant sells, offers to sell, and/or uses
10 network storage systems and methods including, without limitation, the SlickPic photo,
11 media, and file storage and sharing system, the SlickPic App, and any similar products
12 (“Product”), which infringe at least Claim 16 of the ‘797 Patent.

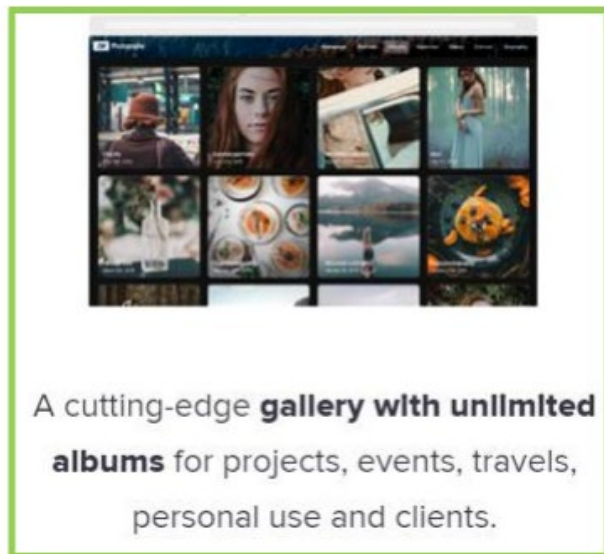
13 15. The Product uses an image capturing device to perform a method. The
14 Product receives and filters photographic images from cameras. The Product also
15 shares the images according to certain conditions. Certain aspects of this element are
16 illustrated in the screenshots below, and/or the screenshots provided in connection with
17 other elements discussed herein.



Source: <https://play.google.com/store/apps/details?id=com.slickpic&hl=en>



Source: <https://play.google.com/store/apps/details?id=com.slickpic&hl=en>



Source: <https://www.slickpic.com/>

16. The Product practices receiving a plurality of images. For example, the Product provides for receiving multiple photos from a user device and receiving the photos in a photo library. The Product's app can access captured images (e.g., images

1 stored on a smartphone) and allow a user to transfer the images to other users. Certain
2 aspects of this element are illustrated in the screenshots below, and/or the screenshots
3 provided in connection with other elements discussed herein.

4 **Maximize your time with a** 5 **gallery that works for you**

6 Drag & drop to create new albums for different
7 audiences, like personal, family, or travel photos, and
8 client photo shoots. Choose the privacy for each
9 album from public, private, and unlisted and even
10 password-protect them.

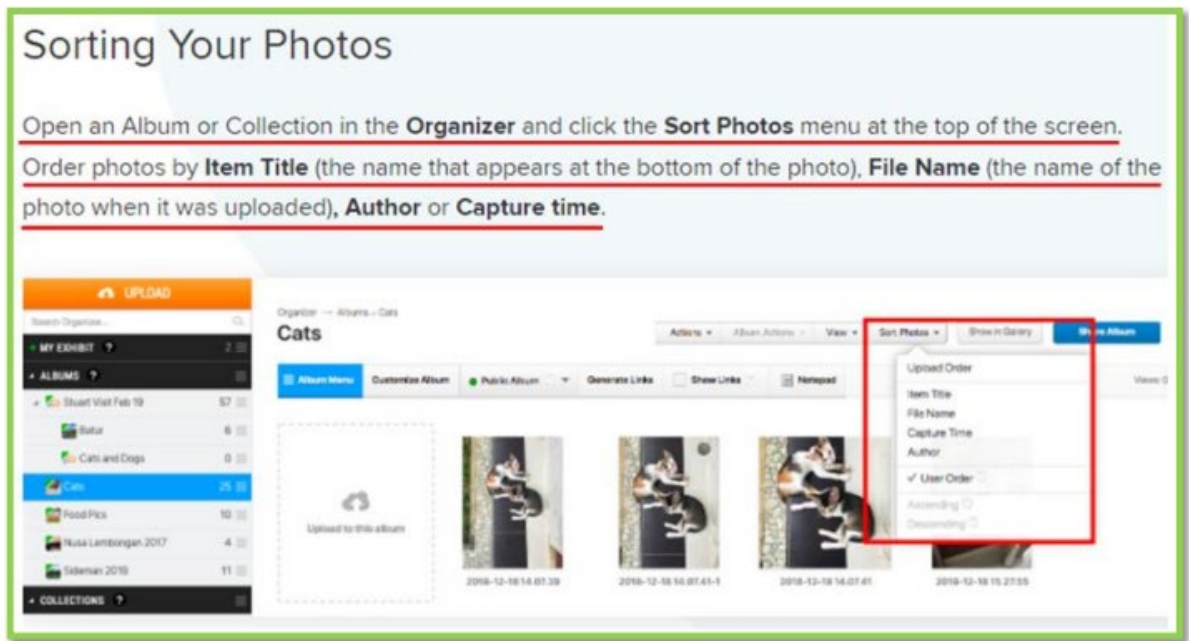
11 Let your clients easily view, proof, share, and
12 download images.

13 Source: <https://www.slickpic.com/>

14 **How to Organize Photos**

15 Using Drag and Drop Change the position of photos in an album by dragging and
16 dropping them into position. You can also drag and drop photos into different
17 albums or collections. To drag and drop multiple photos, select the photos you
18 want to move by clicking the box in the top-right, then drag and drop [...]

19 Source: <https://help.slickpic.com/article-category/albums-and-collections/>



Source: <https://help.slickpic.com/article/how-to-sort-photos-in-albums-and-collections/>

17. The Product practices filtering the plurality of photographic images (e.g., sorting the photos) using a transfer criteria (e.g., users select the images they wish to share, etc.). Certain aspects of this element are illustrated in the screenshots below, and/or the screenshots provided in connection with other elements discussed herein.

How to Organize Photos

Using Drag and Drop Change the position of photos in an album by dragging and dropping them into position. You can also drag and drop photos into different albums or collections. To drag and drop multiple photos, select the photos you want to move by clicking the box in the top-right, then drag and drop [...]

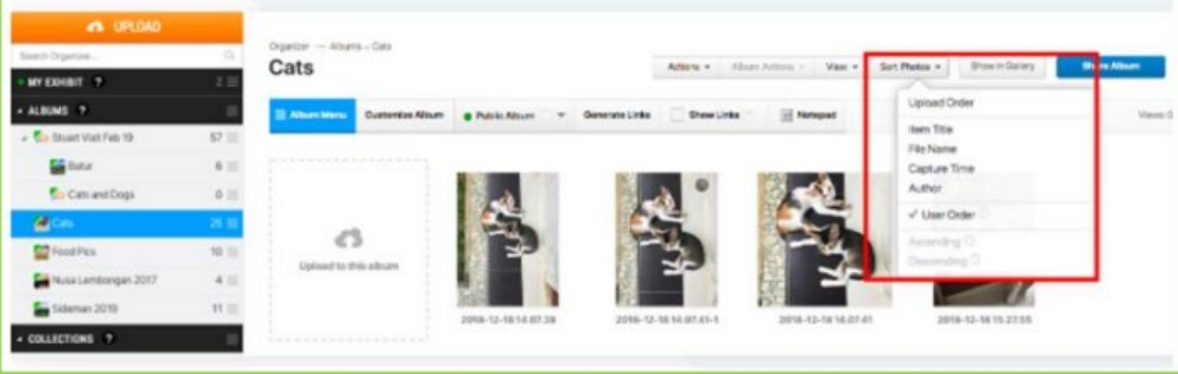
Source: <https://help.slickpic.com/article-category/albums-and-collections/>

Albums When you upload photos to SlickPic they are automatically stored in Albums. Albums are a convenient way of storing and organizing your photos in your account. You will see a list of your albums in the left-hand side menu. Collections A Collection is like a virtual album where you select different photos from your [...]

Source: <https://help.slickpic.com/article-category/albums-and-collections/>

Sorting Your Photos

Open an Album or Collection in the **Organizer** and click the **Sort Photos** menu at the top of the screen. Order photos by **Item Title** (the name that appears at the bottom of the photo), **File Name** (the name of the photo when it was uploaded), **Author** or **Capture time**.



Source: <https://help.slickpic.com/article/how-to-sort-photos-in-albums-and-collections/>

18. The Product practices transmitting, via a wireless transmitter and to a second image capturing device, the filtered plurality of photographic images. For

1 example, files of filtered photos can be shared with other mobile devices. The Product
2 enables a user to search, download, and share photos to a second image capturing
3 device (e.g., another mobile device or a computer). Certain aspects of this element are
4 illustrated in the screenshots below, and/or the screenshots provided in connection
5 with other elements discussed herein.

6 **How to Organize Photos**

7
8 Using Drag and Drop Change the position of photos in an album by dragging and
9 dropping them into position. You can also drag and drop photos into different
10 albums or collections. To drag and drop multiple photos, select the photos you
want to move by clicking the box in the top-right, then drag and drop [...]

11 Source: <https://help.slickpic.com/article-category/albums-and-collections/>

12 Albums When you upload photos to SlickPic they are automatically
13 stored in Albums. Albums are a convenient way of storing and
14 organizing your photos in your account. You will see a list of your
15 albums in the left-hand side menu. Collections A Collection is like a
16 virtual album where you select different photos from your [...]

17 Source: <https://help.slickpic.com/article-category/albums-and-collections/>

18
19 19. When using the Product to share photos with a group (e.g., social media
20 group or private group), the image capturing device and the second mobile device are
21 disposed in a selectively paired relationship with one another based upon an affinity
22 group associated with the second mobile device (e.g., the users of both devices belong
23 to the same social media group and may send images to each other as well as other
24 users). Certain aspects of this element are illustrated in the screenshots below, and/or
25 the screenshots provided in connection with other elements discussed herein.

Share photos intentionally, not accidentally

Control who can share your shared images and turn off access to your images for specific people. Share disappearing albums to control for exactly how long your album is viewable. Everything you need to share smart.



Photo-sharing that you control,
including disappearing albums.

Source: <https://www.slickpic.com/>

Use Collections to group or share photos from different albums. For example, Collections can be designated by theme or category for presentations or to share with specific groups. For more information, see the article What's the Difference between Albums and Collections. Creating a Collection From the Organizer tab, select My Collections. Click on the drop [...]

Source: <https://help.slickpic.com/article-category/albums-and-collections/>

20. Defendant's actions complained of herein will continue unless Defendant is enjoined by this Court.

21. Defendant's actions complained of herein are causing irreparable harm and monetary damage to Plaintiff and will continue to do so unless and until Defendant is enjoined and restrained by this Court.

22. Plaintiff is in compliance with 35 U.S.C. § 287.

JURY DEMAND

23. Under Rule 38(b) of the Federal Rules of Civil Procedure, Plaintiff respectfully requests a trial by jury on all issues so triable.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff asks the Court to:

(a) Enter judgment for Plaintiff on this Complaint on all causes of action asserted herein;

(b) Enter an Order Enjoining Defendant, its agents, officers, servants,

1 employees, attorneys, and all persons in active concert or participation with Defendant
2 who receive notice of the order from further infringement of United States Patent No.
3 8,437,797 (or, in the alternative, awarding Plaintiff a running royalty from the time of
4 judgment going forward);

5 (c) Award Plaintiff damages resulting from Defendant's infringement in
6 accordance with 35 U.S.C. § 284;

7 (d) Award Plaintiff pre-judgment and post-judgment interest and costs; and

8 (e) Award Plaintiff such further relief to which the Court finds Plaintiff
9 entitled under law or equity.

10 Dated: March 27, 2022

Respectfully submitted,

11 /s/Stephen M. Lobbin

12 Stephen M. Lobbin

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16 San Diego, California 92037

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17 ***Attorney(s) for Plaintiff***